

AOS-0026



***National  
Environmental  
Achievement Track***

***Application Form***

WACKER SILICONES CORPORATION

Name of facility

WACKER CHEMIE

Name of parent company (if any)

3301 Sutton Road

Street address

Street address (continued)

Adrian, Michigan 49221

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

Name Robert O. Sullivan

Title Manager, Regulatory Affairs and Product Safety

Phone 517-264-8361

Fax 517-264-8293

E-mail rsullivan@wackersilicones.com

*Why do we need this information?*

EPA needs background information on your facility to evaluate your application.

*What do you need to do?*

- Provide background information on your facility.
- Identify your environmental requirements.

# Section A

*Tell us about your facility.*

1 What do you do or make at your facility?

Wacker Silicones is a producer of silicone fluids, resins, emulsions and sealants.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC  
2821 2822 2869

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

- ☐ Fewer than 50  
☐ 50-99  
☒ 100-499  
☐ 500-1,000  
☐ More than 1,000

## Section 4, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

MID075400671

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

1. Member of the Michigan Business Pollution Prevention Partnership Program for 3 years.
2. Plant site was certified by Wildlife Habitat Council during August 2000.
3. Member of the EPA's 33/50 program.

*Why do we need this information?*

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

*What do you need to do?*

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

# Section B

*Tell us about your EMS.*

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

Compared and wrote EMS to match ISO 14001 requirements along with Responsible Care®.

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other Michigan Clean Corporate Citizen Program verified that our EMS met their requirements.

### *Why do we need this information?*

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

### *What do you need to do?*

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

# Section C

*Tell us about your past achievements and future commitments.*

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

### *First aspect you've selected*

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Waste Reduction	72,000	lbs.	60,000	lbs.
<p>i. How is the current level an improvement over the previous level?</p> <p>12,000 lbs. annual reduction equals 17%</p>				
<p>ii. How did you achieve this improvement?</p> <p>Continued reduction of solvents used primarily for reactor clean outs and decreased the number of process upsets which caused the generation of hazardous waste.</p>				

**Second aspect you've selected**

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Solid waste reduction	700,000	lbs.	500,000	lbs.
<p>i. How is the current level an improvement over the previous level?</p> <p>29% reduction in solid waste generated from production processes.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Recycling and reuse of materials in various processes. Communicating with employees the awareness of waste reduction as a part of the overall process in regards to producing a product.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

**First aspect you've selected**

- a. What is the aspect? Total Solid Waste
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:  
Absolute value 500,000 lbs.  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production  
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:  
Absolute value 400,000 lbs.  
(Quantity/Units)
- ☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

e. How will you achieve this improvement?

Process improvements, re-use of materials and continued employee education on Pollution Prevention.

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### Second aspect you've selected

a. What is the aspect?

Hazardous Solid Waste

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:  
Absolute value 60,000 lbs.  
(Quantity/Units)
- ☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:  
Absolute value 50,000 lbs.  
(Quantity/Units)
- ☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

e. How will you achieve this improvement?

Material substitution as well as process improvements to reduce the number of upsets to decrease the generation of hazardous waste.

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### Third aspect you've selected

a. What is the aspect?

Total Water Usage

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value 29,000,000 gallons  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production  
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value 27,000,000 gallons  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production  
or output (Quantity/Units)

e. How will you achieve this improvement?

Continue to recycle storm water and improve various processes to decrease the total water usage.

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### Fourth aspect you've selected

a. What is the aspect?

Habitat Impacts

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value 3 acres of habitat  
(Quantity/Units)

☐ Option B:  
In terms of  
units of production  
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value 15-20 acres of habitat  
restoration projects on  
site (Quantity/Units)

☐ Option B:  
In terms of  
units of production  
or output (Quantity/Units)



e. How will you achieve this improvement?

1. Restore 5-10 acres of the land back to native prairie grass.
2. Plant 5-10 acres of trees to provide more cover and food for wildlife on the site.

***Why do we need this information?***

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

# Section D

*Tell us about your public outreach and reporting.*

***What do you need to do?***

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

1. Member of the Local Emergency Planning Committee.

2. Annual Community Household Hazardous Waste Day.

3. Work with local schools and community groups to address their concerns.

2 How do you inform community members of important matters that affect them?

Local newspaper, television and radio.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website [www.wackersilicones.com](http://www.wackersilicones.com)

☒ Newspaper

☐ Open Houses

☒ Other

Responsible Care® Household Hazardous Waste Day.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Stubnitz Environmental Education Center	Pam Bunch	517-265-1691
State/Local Regulator	Lenawee Conservation District	Dan Kennedy	517-849-9890
Other community/local reference	LEPC	John Jackson	517-263-2161

# Section E

## *Application and Participation Statement*

On behalf of Wacker Silicones Corporation  
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the *Environmental Requirements Checklist*). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the *Achievement Track EMS requirements*, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

*Thomas Degnan* 9-28-00

Printed Name/Title

Thomas Degnan  
Vice President, Administration

Facility Name

WACKER SILICONES CORPORATION

Facility Street Address

3301 Sutton Road

Facility ID Numbers

MID075400671

## National Environmental Achievement Track

### *Environmental Requirements Checklist*

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

**Facility Name** Wacker Silicones Corporation  
**Facility Location:** 3301 Sutton Road Adrian, Michigan 49221  
**Facility ID Number(s):** MID 075400671  
*(attach additional sheets if necessary)*

#### Air Pollution Regulations

Check All  
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) ☒
2. Permits and Registration of Air Pollution Sources ☒
3. General Emission Standards, Prohibitions and Restrictions ☒
4. Control of Incinerators ☒
5. Process Industry Emission Standards ☒
6. Control of Fuel Burning Equipment ☒
7. Control of VOCs ☒
8. Sampling, Testing and Reporting ☐
9. Visible Emissions Standards ☐
10. Control of Fugitive Dust ☒
11. Toxic Air Pollutants Control ☒
12. Vehicle Emissions Inspections and Testing ☐

**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)**

13. ☐  
14. ☐

#### Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
  - Characteristic Waste ☒
  - Listed Waste ☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - Manifesting ☒

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
  - Transfer facility requirements ☐
  - Manifest system and record-keeping ☐
  - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
  - General facility standards ☒
  - Preparedness and prevention ☒
  - Contingency plan and emergency procedures ☒
  - Manifest system, Record keeping and reporting ☒
  - Groundwater protection ☒
  - Financial requirements ☒
  - Use and management of containers ☒
  - Tanks ☐
  - Waste piles ☐
  - Land treatment ☐
  - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

**Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)**

- 8. ☐
- 9. ☐

**Hazardous Materials Management**

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

**Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)**

- 6. ☐
- 7. ☐

**Solid Waste Management**

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

- |   |                                     |
|---|-------------------------------------|
| 4. Solid Waste Storage and Removal Requirements | <input type="checkbox"/>            |
| 5. Disposal Requirements for Special Wastes     | <input checked="" type="checkbox"/> |

**Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)**

- |    |                          |
|----|--------------------------|
| 6. | <input type="checkbox"/> |
| 7. | <input type="checkbox"/> |

**Water Pollution Control Requirements**

- |   |                                     |
|---|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)                                 | <input checked="" type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116)   | <input checked="" type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)                         | <input checked="" type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122)   | <input checked="" type="checkbox"/> |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129)  | <input type="checkbox"/>            |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)                           | <input type="checkbox"/>            |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)          | <input type="checkbox"/>            |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)        | <input type="checkbox"/>            |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)                  | <input type="checkbox"/>            |
| 10. Water Quality Standards   | <input checked="" type="checkbox"/> |
| 11. Effluent Limitations for Direct Dischargers   | <input type="checkbox"/>            |
| 12. Permit Monitoring/Reporting Requirements  | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input checked="" type="checkbox"/> |
| 14. Collection, Handling, Processing of Sewage Sludge   | <input type="checkbox"/>            |
| 15. Oil Discharge Containment, Control and Cleanup  | <input type="checkbox"/>            |
| 16. Standards Applicable to Indirect Discharges (Pretreatment)  | <input type="checkbox"/>            |

**Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)**

- |     |                          |
|-----|--------------------------|
| 17. | <input type="checkbox"/> |
| 18. | <input type="checkbox"/> |

**Drinking Water Regulations**

- |  |                                     |
|--|-------------------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/>            |
| 2. National Primary Drinking Water Standards (40 CFR 141)                                  | <input checked="" type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)             | <input checked="" type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources   | <input checked="" type="checkbox"/> |
| 5. Underground Injection Control Requirements  | <input type="checkbox"/>            |

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☒

**Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)**

7. ☐  
8. ☐

**Toxic Substances**

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☒  
2. Import and Export of Chemicals (40 CFR 707) ☒  
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☒  
4. Chemical Information Rules (40 CFR 712) ☒  
5. Health and Safety Data Reporting (40 CFR 716) ☒  
6. Pre-Manufacture Notifications (40 CFR 720) ☒  
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐  
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐  
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

**Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)**

10. ☐  
11. ☐

**Pesticide Regulations**

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐  
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐  
3. Certification of Pesticide Applications (40 CFR 171) ☐  
4. Pesticide Licensing Requirements ☐  
5. Labeling of Pesticides ☐  
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐  
7. Disposal of Pesticide Containers ☐  
8. Restricted Use and Prohibited Pesticides ☐

**Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)**

9. ☐  
10. ☐

**Environmental Clean-Up, Restoration, Corrective Action**

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

☒  
☒



2. RCRA Corrective Action (identify)

☐  
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,  
Corrective Action Regulations Not Listed Above (identify)**

3.

☐

4.

☐